

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL F. ARMSTRONG, as Receiver for  
Ashbury Capital Partners, L.P., Ashbury Capital  
Management, L.L.C., Apex Investments and the  
assets of Mark Yagalla,

01 Civ. 2437 (RCC)

Plaintiff,

- against -

RONALD COLLINS and  
LORRAINE COLLINS,

**NOTICE OF CROSS-MOTION**

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, Defendants Ronald Collins and Lorraine Collins, by their attorneys Hodgson Russ LLP, will move this Court at the courthouse located at 500 Pearl Street, New York, New York 1007 before the Honorable Paul A. Crotty as soon as counsel can be heard, for an Order pursuant to Local Civil Rule 6.3 for reconsideration of this Court's March 24, 2010 Order granting partial summary judgment. The Defendants will also move this Court for an Order staying the enforcement of the Order until final resolution of the case.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b),  
answering papers shall be filed within 14 days of the filing of this motion.

DATED: New York, New York  
April 21, 2010

**HODGSON RUSS LLP**

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